

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

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CLERK
U.S. DISTRICT COURT
MINNEAPOLIS, MINNESOTA

WILBERT GLOVER
252673

Plaintiff(s),

(Enter the full name(s) of ALL plaintiff(s)
and prisoner number(s) in this action.)

vs.

Case No. 190304 EXTRA
(To be assigned by Clerk of District Court)

RICHARD RODRIGUEZ
ALBERTS ROSS
R. PAUL #705
MATT BOSTROM
GREG CROUCHER
JOE PAGET AND TOM ROY

Defendant(s).
(Enter the full name(s) of ALL defendants in
this action. Please attach additional sheets
if necessary).

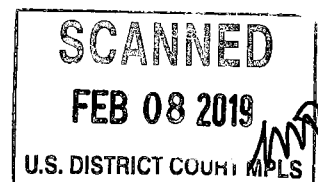
DEMAND FOR JURY TRIAL

YES ☒ NO ☐

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS UNDER
42 U.S.C. § 1983

I. PREVIOUS LAWSUITS

A. Have you begun other lawsuits in state or federal court dealing with the same facts involved



JURISDICTION

Federal courts are courts of limited jurisdiction. Generally, two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount of damages is more than \$75,000 is a diversity of citizenship case.

3. What is the basis for federal court jurisdiction? (*check all that apply*)

☒ Federal Question ☐ Diversity of Citizenship

4. If the basis for jurisdiction is Federal Question, which Federal Constitutional, statutory or treaty right is at issue? List all that apply.

U.S.C. 28 § 1331 28 USC § 1441(c)
42 U.S.C. - TITLE VII SECTION 1983

5. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party? Each Plaintiff must be diverse from each Defendant for diversity jurisdiction.

Plaintiff Name:

State of Citizenship:

Defendant No. 1:

State of Citizenship:

Defendant No. 2:

State of Citizenship:

Attach additional sheets of paper as necessary and label this information as paragraph

5.

Check here if additional sheets of paper are attached. ☐

6. What is the basis for venue in the District of Minnesota? (*check all that apply*)

☒ Defendant(s) reside in Minnesota ☒ Facts alleged below primarily occurred in Minnesota
☐ Other: explain

STATEMENT OF THE CLAIM

Describe in the space provided below the basic facts of your claim. The description of facts should include a specific explanation of how, where, and when each of the defendants named in the caption violated the law, and how you were harmed. Each paragraph must be numbered

in this action or otherwise relating to your imprisonment in the last three years?

☐ Yes

☒ No

B. If you answer to (a) is "yes", describe each lawsuit in the space below.

1. Parties to the previous lawsuit:

Plaintiffs:

Defendants:

2. Court (If federal court, name the district. If state court, name the state and county.):

3. Case Number:

4. Name of judge assigned to the case:

5. Cause of action (Cite the statute under which you filed and write a brief statement of the case):

6. Disposition or final determination of the case (for example, dismissed or appealed).

7. Approximate date of filing the lawsuit:

8. Approximate date of disposition or final determination of the lawsuit:

Attach a copy of the disposition or final determination of the lawsuit if it was filed in a court other than the U.S. District Court for the District of Minnesota.

If there was more than one lawsuit, describe the additional lawsuits on a separate sheet of paper answering the same questions in the same order as above in Question 1(b). Label this information as Question 1(b).

Check here if additional sheets of paper are attached. ☐

II. PRESENT PLACE OF CONFINEMENT

A. Is there a prisoner grievance procedure in the institution?

☒ Yes

☐ No

B. Did you present the facts relating to your complaint in the prisoner grievance procedure?

☒ Yes

☐ No

C. If you answered "yes" to question II.B.:

1. What steps did you take:

"PERSONNEL LETTERS" KITE REQUEST FORM, GRIEVANCES, GRIEVANCE APPEAL, AND INTERNAL AFFAIRS STATEMENT

2. What was the result?

NO ANSWER, NO INVESTIGATION, NO RESPONSE

Attach a copy of the decision or disposition received from the prisoner grievance procedure.*

D. If you answered "no" to question II.B., explain why you did not present the facts relating to your complaint in a prisoner grievance procedure.

III. PARTIES

List your name, prisoner number, address and telephone number. Do the same for any additional plaintiffs. Attach an additional sheet of paper, if necessary.

A. Name of Plaintiff: WILBERT GLOVER

Prisoner Number 252673

Address 1101 LINDEN LANE
FAIRBANKS, MN. 55021

ATTACHED SHEETS 11. **B**

SHERIFF OFFICER PAUL, R. # 704
425 GROVE STREET
ST. PAUL, MINNESOTA. 55101
RAMSEY COUNTY ADULT DETENTION
CENTER - DEFENDANT - 2

SHERIFF OFFICER ALBERT ROSS
425 GROVE STREET
ST. PAUL, MINNESOTA. 55101
RAMSEY COUNTY ADULT DETENTION
CENTER - DEFENDANT - 3

SHERIFF MATT BOSTROM
425 GROVE STREET
ST. PAUL, MINNESOTA. 55101
RAMSEY COUNTY ADULT DETENTION
CENTER DEFENDANT - 4

SHERIFF OFFICER HENDRIK T
425 GROVE STREET
ST. PAUL, MINNESOTA. 55101
RAMSEY COUNTY ADULT DETENTION
CENTER - DEFENDANT - 5

ATTACHED SHEETS 11.B
DEFENDANT'S

UNDER SHERIFF JOSEPH PAGET
425 GROVE STREET
ST. PAUL, MINNESOTA 55101
RAMSEY COUNTY ADULT DETENTION

INSPECTION ENFORCEMENT
FOR RAMSEY COUNTY ADULT
DETENTION CENTER JAIL
GREG CROUCHER

MN. DEPT OF CORRECTIONS
1450 ENERGY PARK DRIVE
SUITE 200, ST. PAUL, MINNESOTA
55108

COMMISSIONER TOM ROY
MN. DEPT OF CORRECTIONS
1450 ENERGY PARK DRIVE
SUITE 200, ST. PAUL, MINNESOTA
55108

Additional Plaintiffs:

Provide each defendant's full name, official position, and place of employment. Attach additional sheets of paper, if necessary.

B. Name: RICHARD RODRIGUEZ

Official Position: HOUSING SERGEANT

Employer's Address:

425 GROVE STREET
ST. PAUL, MN. 55101

Additional Defendants:

JOE PAGET, PAUL, R. # 705, OFFICER HENDRIK

GREG CROUCHER ALBERT, ROSS, MATT BOSTROM
INSPECTION (COMMISSIONER TOM ROY)

NOTE: IF THERE ARE ADDITIONAL PLAINTIFFS OR DEFENDANTS, PLEASE PROVIDE THEIR NAMES AND ADDRESSES ON A SEPARATE SHEET OF PAPER.

Check here if additional sheets of paper are attached: ☒

Please label the attached sheets of paper as II.A. for Plaintiffs and II.B. for Defendants.

IV. STATEMENT OF THE CLAIM

Describe in the space provided below the basic facts of your claim. Describe how each individual defendant is personally involved, including dates, places and specific wrongful acts or omissions by each defendant. Each factual allegation should be provided in separately lettered paragraphs, beginning with letter A. Do not make any legal arguments or cite any cases or statutes.

WILBERT GLOVER WAS IN RAMSEY COUNTY ADULT
A. DETENTION CENTER UNIT 5D SEGREGATION
DATE 12/30/2015 TIME ABOUT 10:00 AM CELL 519D
SHERIFF OFFICER BADGE # 705 PAUL, R HE MADE
ME TAKE OFF MY JUMPSUIT STRIP SEARCH ME TOOK
HIS HAND AND GRASP MY PENIS SQUEEZE IT HARD
AND GESTURES